

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,

Debtors.

)
) Chapter 11
)

) Case No. 25-10068 (CTG)
) Jointly Administered
)

) Re: D.I. No. 1510
)
)

**CERTIFICATION OF COUNSEL OF REVISED ORDER GRANTING MOTION OF
WOODMONT COMPANY, INC., AS RECEIVER FOR MOBILE FESTIVAL
ACQUISITION, LLC FOR ALLOWANCE AND PAYMENT OF ADMINISTRATIVE
EXPENSE CLAIM PURSUANT TO 11 U.S.C. § 503(B)(1)**

I, Michael J. Joyce, counsel for Woodmont Company, Inc. as Receiver for Mobile Festival Acquisition, LLC (“Movant”), hereby certify as follows:

1. On July 31, 2025, Movant filed the *Motion of Woodmont Company, Inc., as Receiver for Mobile Festival Acquisition, LLC for Allowance and Payment of Administrative Expense Claim Pursuant To 11 U.S.C. § 503(b)(1)* [D.I. No. 1510] (the “Motion”).

2. Counsel for Movant and counsel for the Plan Administrator have reached agreement on a revised proposed form of order (the “Proposed Order”) resolving the Motion. A true and correct copy of the Proposed Order is attached hereto as Exhibit “A”.

[Signature Page to Follow]

WHEREFORE, it is hereby respectfully requested that the Court enter the Proposed Order attached hereto as **Exhibit A** at its earliest convenience.

Dated: September 30, 2025

JOYCE, LLC

/s/ Michael J. Joyce

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